



Clean Harbors Recycling Services of Chicago, LLC
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Air and Radiation Division
EPA Region 5
77 W. Jackson Blvd. (AE-18J)
Chicago, IL 60604
Attn: Compliance Tracker

Office of Regional Counsel
EPA Region 5
77 W. Jackson Blvd. (C-14J)
Chicago, IL 60604

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Dear Sir/Madam:

Clean Harbors Recycling Services of Chicago, LLC (Clean Harbors Chicago) and Clean Harbors Recycling Services of Ohio, LLC (Clean Harbors Hebron) are submitting a consolidated report for the Semi-Annual Compliance Status Report covering the period August 27, 2019 through December 31, 2019.

The following is a progress report on the implementation of the requirements of Section V of the Consent Decree by paragraph (Injunctive Relief):

A. Installing New Emergency Vents on the Hebron Tanks and Ceasing the Use of Loose-Bolt Manhole Covers as Emergency Vents

13. Clean Harbors Hebron completed the installation of a new Emergency Vent on each Hebron tank by retrofitting each loose-bolt manhole cover with a new Emergency Vent.

14. Clean Harbors Hebron has permanently ceased using the tank's loose-bolt manhole covers as an Emergency Vent. Any loose-bolt manhole covers retrofitted with a new Emergency Vent have all 24 bolts of the loose-bolt manhole cover in place and each bolt is secured by a nut.

15. During this period, Clean Harbors Hebron did not open Emergency Vents for the purpose of normal operations to maintain internal tank pressure.



B. Purchase of Use of a Method 21 Monitoring Instrument Equipped with a Flame Ionization Detector for the Hebron Facility

16. Clean Harbors Hebron purchased an instrument equipped with a Flame Ionization Detector for use in Method 21 monitoring before this period began. All employees reasonably expected to perform Method 21 monitoring at the Hebron facility were trained in the use of the FID-equipped instrument by October 4, 2019. There were no new employees reasonably expected to perform Method 21 monitoring at the Hebron facility during this period. All contractors reasonably expected to perform Method 21 monitoring at the Hebron facility were trained in the use of the FID-equipped instrument.

C. Method 21 Monitoring of the Vents on the Hebron and Chicago Tanks; Repairs

17.

a. Clean Harbors Chicago monitored the Emergency Vents on the Chicago Tanks on a quarterly basis using Method 21.

b. Clean Harbors Hebron monitored the Emergency Vents on the Hebron Tanks on a quarterly basis using Method 21. All Emergency Vents were monitored using Method 21 by Montrose, the consultant/contractor after installation was complete.

c. Clean Harbors Chicago and Clean Harbors Hebron followed the repair requirements for Emergency Vents for Method 21 readings above background by completing first attempts of repair no later than 5 calendar days after the Method 21 monitoring event. All repairs were completed with 45 calendar days of the monitoring event.

18.

a. Clean Harbors Chicago monitored the Pressure-Vacuum-Relief/Conservation Vents on the Chicago Tanks on a monthly basis using Method 21, except Pressure-Vacuum-Relief/Conservation Vents routed to a process or fuel gas system or equipped with a closed-vent system capable of capturing and transporting leakage from the Pressure-Vacuum-Relief/Conservation Vent to a control device described in 40 C.F.R. 63.172 or 61.242-11.

b. Clean Harbors Hebron monitored the Pressure-Vacuum-Relief/Conservation Vents on the Hebron Tanks on a monthly basis using Method 21, except Pressure-Vacuum-Relief/Conservation Vents routed to a process or fuel gas system or equipped with a closed-vent



system capable of capturing and transporting leakage from the Pressure-Vacuum-Relief/Conservation Vent to a control device described in 40 C.F.R. 63.172 or 61.242-11.

c. Clean Harbors Chicago and Clean Harbors Hebron followed the repair requirements for Pressure-Vacuum-Relief/Conservation Vents for Method 21 readings of 500 ppm VOC above background or greater by completing first attempts of repair no later than 5 calendar days after the Method 21 monitoring event. All repairs were completed with 15 calendar days of the monitoring event.

D. Comprehensive Third-Party LDAR Evaluation and Compliance Assistance Program

19. Clean Harbors Chicago and Clean Harbors Hebron retained a third-party consultant/contractor with expertise in LDAR regulations applicable to treatment, storage, and disposal facilities to undertake a comprehensive LDAR evaluation and compliance assistance program at each facility prior to the reporting period.

20. Clean Harbors Chicago ensured that the consultant/contractor completed its work consistent with the Requirements of Appendix C of the Consent decree and submitted the report required by Section 8 of Appendix C prior to the reporting period. Clean Harbors Hebron ensured that the consultant/contractor completed its work consistent with the Requirements of Appendix C of the Consent decree and submitted the report required by Section 8 of Appendix C by October 14, 2019.

21. Clean Harbors Chicago and Clean Harbors Hebron accepted each recommendation of the consultant/contractor for the reports.

22. Clean Harbors Chicago and Clean Harbors Hebron are submitting the Comprehensive LDAR Evaluation and Compliance Assistance Reports with this first Semi-Annual Report. The reports are attached.

E. LDAR Audits

23. The LDAR audits for the Clean Harbors Chicago and Clean Harbors Hebron facilities were not required during this reporting period.

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26. The LDAR audits for the Clean Harbors Chicago and Clean Harbors Hebron facilities were not required during this reporting period.

27. The LDAR audits for the Clean Harbors Chicago and Clean Harbors Hebron facilities were not required during this reporting period.

F. Mitigation Projects

28. Emission Control Project on Certain Chlorinated Solvent Tanks at the Hebron Facility.

a. & b. Clean Harbors Hebron has received approval from the air permitting authority to modify the Hebron facility tanks T90, T91, T95, T98, T112, T131, T132, T137, T89A, T102B by replacing Pressure-Vacuum-Relief/Conservation Vents with a vent that will allow a connection to new piping to an existing vent header that is already connected to a thermal oxidizer.

c. Clean Harbors Hebron has not changed the contents of these ten tanks.

29. Emission Control Project on Tank 38 at the Chicago Facility.

a. Clean Harbors Chicago submitted an application to the air permitting authority to modify the existing air permit at the Chicago facility to enable the installation of tank emission controls for Tank 38 by replacing the existing Pressure-Vacuum-Relief/Conservation Vent with a vent that will allow a connection to new piping to a dual carbon canister adsorption system “in series”. The application was submitted October 25, 2019. Clean Harbors Chicago has not yet received approval, but expects approval shortly.

b. Clean Harbors Chicago has not yet received approval for the dual carbon canister adsorption system.

c. Clean Harbors Chicago has not yet received approval for the dual carbon canister adsorption system.

Clean Harbors Chicago and Clean Harbors Hebron are not identifying any non-compliance with the requirements of Section V during the reporting period and do not anticipate any problems in the future with respect to meeting the requirements of Section V.